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9 Attorneys for Plaintiff
UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 MAKSIM ZAITSEV,

16 Defendant.

No. 2:25-cr-00154-SPG

PROPOSED JOINT STATEMENT OF THE
CASE

Date: May 20, 2025
Time: 8:30 a.m.
Location: Courtroom of the
Hon. Sherilyn Peace
Garnett

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19 Plaintiff United States of America, by and through its counsel
20 of record, the United States Attorney for the Central District of
21 California and Assistant United States Attorneys Rahul R.A. Hari and
22 Neil P. Thakor, and defendant MAKSIM ZAITSEV, by and through his
23 counsel of record, Deputy Federal Public Defenders Shannon M. Coit
24 and Ryan Shelley, hereby submit their Proposed Joint Statement of the
25 Case.

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1 The parties respectfully reserve the right to modify this
2 statement as needed.

3 Dated: April 30, 2025

Respectfully submitted,

4 BILAL A. ESSAYLI
United States Attorney

5 LINDSEY GREER DOTSON
6 Assistant United States Attorney
Chief, Criminal Division

7
8 /s/
9 RAHUL R.A. HARI
NEIL P. THAKOR
Assistant United States Attorneys

10 Attorneys for Plaintiff
11 UNITED STATES OF AMERICA
12

13 Dated: April 30, 2025

/s/
14 SHANNON M. COIT
15 RYAN SHELLEY
Deputy Federal Public Defenders

16 Attorney for Defendant
MAKSIM ZAITSEV
17

18 I, RAHUL R.A. HARI, attest that all other signatories listed, and on
19 whose behalf the filing is submitted, concur in the filing's content
20 and have authorized the filing.
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22 /s/
23 RAHUL R.A. HARI
Assistant United States Attorney
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STATEMENT OF THE CASE

The United States charges defendant MAKSIM ZAITSEV with assaulting a federal officer resulting in bodily injury, in violation of 18 U.S.C. § 111(a)(1), (b). Specifically, the government alleges that defendant bit down on and fractured a federal officer's finger.

Defendant has entered a plea of not guilty and asserts that he acted in self-defense. [if applicable]